

South Coast Air Quality Management District

Statement of Basis

Proposed Renewal Title V Permit

Facility Name:	Light Metals, Inc.
Facility ID:	083102
SIC Code:	3341
Equipment Location:	13329 Ector Street City of Industry, CA 91746
Application #(s):	526177
Application Submittal Date(s):	08/04/11
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, and lead are in attainment with federal standards. The status of CO is currently serious nonattainment, but AQMD has petitioned to EPA for re-designation to

attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme non-attainment.

A Title V permit is proposed to be issued to cover the operations of Light Metals, Inc, located at 13329 Ector Street, City of Industry. This facility is subject to Title V requirements because it is a major source and is subject to certain NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements.

2. Facility Description

This is an existing facility that is in the business of producing custom secondary aluminum alloy ingot for the metal casting industry. Light Metals melts and alloys a variety of recycled aluminum products, in order to produce these ingots. First aluminum scrap is received and stored until it is ready to be used. Then if needed, the aluminum scrap is processed through one of the two scrap dryers, some scrap can be charged directly into the furnaces. The scrap goes to the charging well of one of the two Reverberatory furnaces. Once the aluminum is melted it is alloyed and finally it is cast into ingots.

3. Construction and Permitting History

The facility has been in constant operation since December 12, 1990. Numerous permits to construct and permits to operate have been issued to the facility since June 28, 1991. An initial Title V permit was issued to the facility on June 1, 2000. On February 1, 2007, the Title V permit was renewed and subsequent revisions were issued on September 9, 2008 and August 17, 2010.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to the NESHAP requirements of 40 CFR Part 63 Subpart RRR. The Scrap Dryers and Group 1 Furnaces are subject to emission standards of this subpart, and are in compliance with their applicable emission standards. The permit terms and conditions for the above units and associated control devices may be found in Sections D, H and J of the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which this facility is required to comply are identified in the Title V permit (for example, Section D, F, H, and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA

Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

There are no permitted units at this facility with pre- or post-control emissions of at least 100% of the major source threshold amount. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2010

Pollutant	Emissions (tons/year)
NO _x	5.754
CO	3.093
VOC	0.653
PM	2.745
SO _x	0.051

Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2010

The Following TACs Were Reported	Emissions (lbs/yr)
1,3-Butadiene	0.029
2-Methyl naphthalene [PAH, POM]	0.003
Acenaphthene	<0.001
Acenaphthylene	<0.001
Ammonia	551.473
B[GHI] Perylene	<0.001
Benzene	1.27
Benzo[b]fluoranthene	<0.001
Benzo[e]pyrene [PAH, POM]	<0.001
Beryllium	0.012
Cadmium	0.101
Carbon tetrachloride	0.004
Chrysene	<0.001
Dibenzofurans (Chlorinated)	<0.001
Ethylene dibromide	0.004
Ethylene dichloride	0.002
Fluoranthene	<0.001
Fluorene	<0.001
Formaldehyde	8.474
Lead compounds (inorganic)	2.62
Methylene chloride	0.002
Naphthalene	0.059
Nickel	0.448
PAHs, total, w/o individ. Components reported (PAH, POM)	0.017
Phenanthrene	0.001
Pyrene	<0.001
Vinyl chloride	0.001

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved on 2002 with the following risk factors:

Cancer Risk	4.5 in one million
Acute Hazard Index	0.04
Chronic Hazard Index	2.70

8. Compliance History

As noted, the facility has been in constant operation since December 12, 1990, they are located in an area that is a combination of industrial and residential. Their entire northeast property line borders Torch Middle School. The facility has been subject to both self-reporting requirements and AQMD inspections. There have been 6 complaints for odors in the past 2 years credited to Light Metals. Usually, the inspector is able to verify at least a faint odor emanating from Light Metals; but not a violation of AQMD rules.

In the past two years, the facility has been issued 2 Notices to Comply, one to maintain records and one to correct information on a spreadsheet. Corrective action has been already made for the Notices to Comply. No Notices of Violation issued to the facility within the last two years.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

There are currently no other pending permitting actions for Light Metals, Inc.